United States Information Agency

Office of Inspector General

Semiannual Report To The Congress

October 1, 1992 - March 31, 1993

This report has been provided, through the
Director of the United States Information Agency,
to the following Congressional oversight committees:

Senate Committee on Appropriations
Senate Committee on Foreign Relations
Senate Committee on Governmental Affairs
House Committee on Appropriations
House Committee on Foreign Affairs
House Committee on Governmental Affairs

United States Information Agency

Washington, D.C. 20547

INSPECTOR GENERAL

April 30, 1993

Mr. John Condayan, Acting Director

In accordance with the Inspector General Act of 1978 (Public Law 95-452), as amended, I am forwarding herewith the semiannual report of the Inspector General that covers the six-month period from October 1, 1992 through March 31, 1993.

This is the sixth semiannual report I have issued as the USIA Inspector General. During the period of my tenure, USIA has made significant progress in correcting a number of systemic deficiencies and weaknesses in the management of Agency programs and operations identified by this office.

Unfortunately, however, there are still a number of problems, previously reported, which remain uncorrected. And, while solutions to rectify many of them have been proposed or are being implemented, final corrective actions have yet to be realized. For example, USIA has been wrestling with the problem of property management and accountability since 1985, and yet, as evidenced by recent Inspector General reviews, problems still exist, especially in the reconciliation of property records between overseas posts and USIA Headquarters in Washington. Other areas of concern are noted in the appended report. If real progress is to be made in correcting these problems, they must be afforded a higher priority. Until resolved, they will continue to be reported by this office.

The Act requires that this report be transmitted to the appropriate committees of Congress within 30 days of receipt.

George F. Murphy

George F. Murphy Jr.
Inspector General

INSPECTOR GENERAL ACT OF 1978

Purpose:

In order to create independent and objective units ... there is hereby established in each of such establishments an office of Inspector General.

Duties and Responsibilities:

(a) It shall be the duty and responsibility of each Inspector General with respect to the establishment within which his Office is established...

(1) to provide policy direction for and to conduct, supervise, and coordinate audits and investigations relating to the programs and operations of such establishment...

(3) to recommend policies for and to conduct, supervise, or coordinate other activities carried out or financed by such establishment for the purpose of promoting economy and efficiency in the administration of, or preventing and detecting fraud and abuse in, its programs and operations...

(5) to keep the head of such establishment and the Congress fully and currently informed, by means of the reports required in section 5 and otherwise, concerning fraud and other serious problems, abuses, and deficiencies ..., to recommend corrective action concerning such problems, abuses and deficiencies, and to report on the progress made in implementing such corrective action.

Semiannual Reports:

(a) Each Inspector General shall, not later than April 30 and October 31 of each year, prepare semiannual reports summarizing the activities of the Office during the immediately preceding six-month periods ending March 31 and September 30.

Excerpt from Public Law 95-452, as amended.

United States Information Agency

Office of Inspector General

SEMIANNUAL REPORT TO THE CONGRESS

Issue: 93-I

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DIGEST

This report is issued pursuant to the Inspector General Act of 1978, as amended. The report covers the six month period fromOctober 1, 1992 through March 31, 1993.

HIGHLIGHTS OF NEW ISSUES

GENERAL MANAGEMENT AND ADMINISTRATION

Plans to Consolidate the Office of Cuba Broadcasting at a Cost of $3.5 Million Should be Canceled

The Office of Cuba Broadcasting (OCB) plans to consolidate its television component (TV Marti) facilities with its other Washington, D.C. radio broadcast operations at a cost of $3.5 million. This consolidation is not cost effective and should be canceled. The project has not been supported by a detailed cost-benefit review. Also, it has yet to be demonstrated that the existing TV broadcast facilities are inadequate to meet current operational requirements. In addition, over $450,000 worth of TV equipment purchased seven months ago for the project is still in storage and should be put to immediate use.

OIG was advised that USIA has decided to proceed with a cost-benefit analysis of this project and is reexamining its plans for equipment in storage.

It should also be noted that the U.S. Advisory Commission on Public Diplomacy has recommended that TV Marti be closed down. (See page 7.)

FINANCIAL MANAGEMENT

Significant Savings Possible on International Airline Travel

USIA could realize savings of about $270,000 annually if its travel management center (TMC) were to provide refunds for both international and domestic travel, instead of just domestic travel. Other federal agencies with significant international travel could also realize substantial savings.

The General Services Administration (GSA), which administers the TMC program believes that, under Section 403(b) of the Federal Aviation Act, refunds for international travel cannot be made mandatory. However, on behalf of and at USIA's request, GSA has agreed to approach the Department of Transportation, which administers the Act, regarding this issue. (See page 9.)

Integration of Financial Management Systems Needs To Be Expedited

Development of USIA's plans to integrate its existing core accounting and key subsidiary systems, as reported in USIA's fiscal year 1992 Federal Managers' Financial Integrity Act report, has been postponed one year to August 31, 1993. OIG has urged USIA management to expedite its decision and to proceed with cost effective system integration efforts in the interim to eliminate time-consuming and error-prone accounting procedures. (See page 9.)

Grants Management

Improvements Needed in Programming Labor-Related International Visitors

Programming of labor-related international visitors (IVs) by the Free Trade Union Institute (FTUI), a grantee of USIA's Bureau of Educational and Cultural Affairs, does not provide the elements of balance and diversity the Bureau deems necessary to fulfill the intent of the Fulbright-Hays Act. However, the lack of clearly defined standards for balance and diversity in FTUI's agreement with USIA, inadequate coordination and inadequate program evaluation by USIA contributed to this situation.

In addition, available data indicate that FTUI had the highest average administrative cost per participant of the eight IV programming agencies during fiscal years 1991 and 1992.

Further, there is evidence that some USIA officials discouraged the use of FTUI as a programming agency for labor-related IVs. It should be noted that despite these actions, visitors programmed by FTUI increased by almost eight percent since fiscal year 1990.

OIG reviewed the labor IV program in response to a request from the House and Senate Appropriations Committees. (See page 11.)

Criminality and Misconduct Investigations

Convictions and Indictments

During this semiannual reporting period there were two convictions, five proposed indictments and/or plea agreements, and one declination of prosecution in favor of administrative remedy by USIA.

As of March 31, 1993, OIG had a total of nine investigations pending at the Department of Justice for suspected federal criminal violations. (See page 12.)

Overseas Post Management

Over $125,000 Annual Savings Potential at USIS Philippines

There are a number of areas at USIS Philippines where efficiency could be improved and/or economies effected. For example, $125,000 in annual savings could be achieved by reducing staff and consolidating cultural center staff operations. The post property inventory list was found to be out of date and could not be reconciled with USIA Headquarters property records. (See page 13.)

HIGHLIGHTS OF FOLLOW-UP ACTIONS

USIA has made some progress in correcting deficiencies previously reported. For example, USIA instituted a senior-level Resource Management Committee to ensure that resource decisions are made which prevent unneeded or unnecessary year-end spending and has issued regulations intended to provide for an accounting of J-Visa authorization forms. Highlights of other actions, both concluded and still outstanding, are as follows:

Criminality and Misconduct Investigations

Senior Official Prosecuted

A former senior USIA official was prosecuted after pleading guilty to time and attendance irregularities amounting to about $17,000. (See page 16.)

Questioned Cost Resolution

Inadequate Support for Allowing Questioned Costs

USIA grantee costs questioned by OIG have been allowed by the Office of Contracts based on inadequate support. In addition, an analysis of costs actually collected based on $4,172,442 questioned by OIG during fiscal years 1988 through 1992 amounted to $1,022,081, or about 24 percent, some of the difference attributable to unsupported costs. (See page 16.)

VOA Modernization Program

Slow Progress on Sri Lanka Relay Station

The lack of progress and amount expended for construction of the VOA relay station in Sri Lanka continue to be matters of concern to OIG. From fiscal years 1984 through 1990, about $9 million was expended on the design of a large relay station that was subsequently canceled because of financial constraints. An additional $44.4 million has been obligated for a scaled back version. However, with the exception of a security fence around the Chilaw site, actual construction on the new station has not begun. (See page 17.)

Property Management

System Improvements Still Being Implemented

USIA's Property Inventory Accountability System could not accurately account for over $200 million of non-expendable personal property worldwide. This weakness was first identified in the fiscal year 1985 Federal Managers' Financial Integrity Act report. The Bureau of Management plans to implement a new personal computer based property management system by March 1994, but property management problems persist. (See page 18.)

Acquisition Management

Process Needs To Be Strengthened

The Office of Contracts is now using a new automated procurement system to strengthen the acquisition management process. It has also agreed to tighten controls related to other deficiencies previously reported by OIG. (See page 19.)

J-Visa Program

Visitor Tracking Issue Still of Concern

Regulations governing the J-Visa program, including the accounting of J-Visa authorization forms were issued in March 1993. However, these regulations do not enable USIA to determine whether the visitors it sponsors return to their home countries upon completion of their programs. USIA believes that such a determination is the jurisdiction of the Immigration and Naturalization Service. (See page 20.)

Seville Expo '92

Construction Costs Remain Unpaid

Construction costs of $2.06 million ($1.8 million based on the March 31, 1993 exchange rate) for the U.S. Pavilion at the Seville Expo remain unpaid. As a result USIA may be liable for significant interest and other costs if the claim remains unsettled. In addition, the costs related to the design and installation of the Bill of Rights exhibit at the pavilion remain undetermined. (See page 21.)

National Endowment for Democracy (NED)

About $3 Million in Grantee Costs Questioned

About $3 million in NED grantee costs were questioned of which approximately $800,000 were unallowable and $2.2 million unsupported. To date, NED has sustained $1,743 out of $298,578 questioned by OIG. This determination is under review by the Office of Contracts and OIG. (See page 22.)

Grants Management

Misuse of Grant Funds

· The improper use of $290,000 in grant funds by Delphi Research Associates for unauthorized loans to, and investments in, its profit making affiliates, as well as other expenditures, are currently being examined by OIG's investigative unit. (See page 23.)

· The questionable expenditure of $59,500 of a $60,000 grant by the International Development Exchange is under review by the USIA Office of Contracts. Certain aspects of this matter are also being examined by OIG's investigative unit. (See page 24.)

· A report on improper grant awards totalling $56,161 by USIS Paris officers, a practice followed since at least 1985, has been forwarded to the Office of the U.S. Attorney for review. (See page 24.)

Overseas Post Management

Some Recommendations Addressing Eastern European Operations Remain Unimplemented

Of 125 recommendations resulting from a review of posts in five Eastern European countries, 22 remain unimplemented including those relating to property accountability and audience identification and tracking systems. Also, another unimplemented recommendation is to install a fire alarm system at the American Library in Bucharest, Romania which has existed as a requirement since 1972. (See page 25.)

STATISTICAL SUMMARY

I. Activities

Audit and Inspection Reports Issued (See Appendix A)	20
Investigations Closed (See Appendix B)	7

II. Potential Savings From Reports Issued This Period

Questioned Costs (See Appendix A)	$ 18,225
Recommendations that Funds Be Put to Better Use (See Appendix A)	$ 3,895,000
TOTAL	**$ 3,913,225**

III. Monetary Impact From Reports For Which Decisions Were Made This Period

Questioned Costs Sustained (Subject to change by USIA Final Actions) (See Appendix C)	$ 270,760
Funds Put to Better Use (Subject to change by USIA Final Actions) (See Appendix D)	$ 395,000
Investigative Restitutions (See Appendix B)	$ 19,531
TOTAL	**$ 685,291**

IV. Reports With Monetary Impact for Which No Decisions Were Made This Period

Number Less Than Six Months Old	14
Dollar Value (See Appendices C and D)	$ 7,309,430
Number More Than Six Months Old	2
Dollar Value (See Appendices C and D)	$ 978,744

OPERATIONAL ACTIVITIES

Office of Inspector General activities during this period identified problems in USIA relating to general management and administration, financial and grant management, and overseas post operations. Investigations relating to criminality and employee misconduct were also conducted.

General Management and Administration

Plans to Consolidate the Office of Cuba Broadcasting at a Cost of $3.5 Million Should be Canceled

The Office of Cuba Broadcasting (OCB) plans for consolidating its television and radio facilities in Washington, D.C. at a cost of $3.5 million are not cost effective and should be canceled. The consolidation entails construction of a television broadcast studio at an estimated cost of $2.5 million for TV Marti's exclusive use, and $1 million for relocation costs.

USIA is developing plans to permanently relocate all of its Washington based elements by the year 2001. OIG recommended that the Acting Associate Director for Broadcasting cancel plans to construct temporary TV Marti broadcast facilities in the Donohoe Building, where the radio facilities are located. OIG also recommended making immediate use of the $450,000 worth of new broadcast equipment that was purchased in anticipation of the proposed move.

OIG was advised that USIA has decided to proceed with a cost-benefit analysis of the Washington consolidation project in the Donohoe Building and is reexamining its plans for the equipment not already in use.

In addition, there is also a recommendation from the President's Advisory Board for Cuba Broadcasting to permanently consolidate OCB operations in the Miami, Florida area. No estimate of the relocation costs is currently available. OIG recommended that the Acting USIA Director require the Acting Associate Director for Broadcasting to perform a detailed cost-benefit analysis regarding relocation plans and related costs for consideration prior to any decision or contractual commitment. According to USIA, the Bureau of Broadcasting had been conducting such a cost-benefit analysis, at the request of the Advisory Board, when OIG began reviewing this issue. However, action on this cost-benefit analysis has been deferred pending the swearing in of a new USIA director.

It should also be noted that the U.S. Advisory Commission on Public Diplomacy has recommended that TV Marti be closed down.

Compliance with Lobbying Restrictions

For fiscal year 1992, USIA had generally complied with the restrictions on lobbying contained in 31 USC 1352 and 22 CFR Part 519. However, there were six instances where required certifications regarding lobbying were not filed by grantees or were not included as a clause in the contract. Officials in the Office of Contracts have obtained the three grantees' certifications.

However, there were also three contracts that did not include the required lobbying clause. In one, the clause had been inadvertently omitted. The other two were contracts with foreign government entities that Office of Contracts believed were not subject to the lobbying restrictions. However, USC 1352 requires the submission of the lobbying certification as a prerequisite for making or entering into all covered federal actions. Failure to file certifications subjects the recipients to civil fines. In order to strengthen USIA's compliance with restrictions on lobbying provisions with respect to contracts, OIG recommended that the Director, Office of Contracts, require that USIA solicitations and contracts incorporate the standard clause from Federal Acquisition Regulation 52.203.11 on lobbying provisions to comply with 31 USC 1352.

The Director, Office of Contracts, concurred with OIG's recommendation and provided acceptable plans for implementation.

Energy Conservation Practices

USIA is in substantial compliance with prescribed federal energy reporting requirements to reduce energy consumption and costs. Specifically, USIA has an adequate management system to report quarterly to the Department of Energy (DOE) on domestic and overseas energy consumption, and to provide annual cost information.

Innovative actions at the Bureau of Broadcasting radio relay stations have resulted in energy conservation and a decrease in operational costs. Based on long-term mission requirements, relay station managers have implemented life-cycle replacement schedules for energy-intensive transmitters, replacing them, as warranted, with newer, more energy efficient ones. For example, one station projects savings of over $1 million per year in power costs by replacing six of its sixteen older transmitters between fiscal years 1992 through 1996. Also, by coordinating their activities with local power

companies, two stations have recently signed contracts which will net savings of about $225,000 per year.

There are, however, two areas where USIA could strengthen its energy management and conservation practices. In this regard, OIG recommended that energy and conservation activities be formalized at one of its warehouses to comply with the requirements of the Energy Policy Act. Second, USIA's Manual of Operations and Administration should be revised to include reference to current federal energy conservation laws and regulations such as the Energy Policy Act of 1992 and Executive Order 12759.

USIA management concurred with OIG's recommendations.

FINANCIAL MANAGEMENT

Significant Savings Possible on International Airline Travel

USIA could realize savings of about $270,000 annually if Omega World Travel would refund a portion of USIA's cost for international airline travel. Omega, USIA's travel management center (TMC), issues monthly cash refunds to USIA called "revenue shares." These refunds amount to about 4 percent of USIA's domestic airline travel. Some federal agencies, such as the Departments of the Army and the Air Force, obtain revenue shares on all airline travel — both domestic and overseas. Based on an OIG recommendation, USIA urged the General Services Administration (GSA), the contracting agency, to amend the current contract to include both domestic and international travel in the revenue share calculation.

GSA's position is that they have correctly interpreted the Federal Aviation Act, Section 403(b), and that international rebates cannot be made mandatory in their TMC contracts. However, on behalf of and at USIA's request, GSA has agreed to approach the Department of Transportation, which administers the Act, regarding this issue.

OIG is doing additional follow-on work concerning travel policies and procedures.

Integration of Financial Management Systems Needs To Be Expedited

Development of USIA's plans to integrate its existing core accounting and key subsidiary systems, as reported in USIA's fiscal year 1992 Federal Managers' Financial Integrity Act report, have been delayed until August 31, 1993. One integration issue of particular concern involves the financial data received from overseas.

USIA relies on the Department of State for processing overseas accounting and payroll data, which represent nearly 40 percent of the total USIA budget. However, the Office of Comptroller has experienced problems concerning such data, including missing and late reports from State which impact USIA's fiscal year-end closing process. USIA does not have an automated system for processing the data received from State. Therefore, overseas data are manually combined with the domestic data, a process which, according to USIA officials, is time consuming, has a high potential for error and makes reconciliation of accounting data difficult.

Because of the importance of obtaining timely and accurate financial data, OIG urged USIA management to expedite its decision on the core system and to proceed with cost effective systems integration efforts in the interim.

Leadership of the Federal Managers' Financial Integrity Act Program Needs to be Strengthened

There were four Directors of Internal Control over the last 3 years resulting in a lack of continuity and delay in fully implementing USIA's Internal Control Program. For example, USIA's Management Control Plan has not been updated to include plans for risk assessments and internal control reviews.

Implementation of Prompt Payment Act is Adequate but Needs to be Srengthened

USIA instituted an adequate quality control system to assess its implementation of the Prompt Payment Act. However, improvements in sampling methodology would further strengthen the system.

Some areas in USIA's invoice payment procedures and internal control procedures needed strengthening to comply with the Act and with Office of Management and Budget requirements. For example, 25 of 81 invoices sampled by OIG were paid too late and four were paid too early.

On March 12, 1993, USIA issued Announcement No. 93-064 which stated:

> *"All USIA elements and personnel involved in procurements and processing of invoices must take immediate steps to reduce late payments and interest penalties and ensure prompt date stamping of invoices."*

Grants Management

Improvements Needed in Programming Labor-Related International Visitors

At the request of the House and Senate Appropriations Committees, OIG reviewed the labor international visitor (IV) program, focusing primarily on four USIA allegations of deficiencies in programs administered by the Free Trade Union Institute (FTUI), one of USIA's grantees, and on an allegation by FTUI that officials in USIA have attempted to undermine the FTUI program.

While USIA's allegations had some basis in fact, the lack of clearly defined standards, inadequate coordination, and inadequate program evaluation by USIA's Bureau of Educational and Cultural Affairs (E Bureau) contributed to problems associated with FTUI's programming of labor IVs in recent years. FTUI's allegation also had merit in that two USIA officials had discouraged participation in FTUI's labor programs. OIG's findings on the five allegations are summarized in more detail below.

First, FTUI's programming of labor-related IVs did not provide the elements of balance and diversity that USIA deems necessary to fulfill the intent of the Fulbright-Hays Act. Some USIA officials claimed that their suggestions to include balance and diversity in FTUI programs were rejected by FTUI programmers. However, in some cases, where specific written requests for non-labor events were made by embassy officials, FTUI programmers attempted to satisfy those requests. Also, USIA had not clearly defined its requirements for balance and diversity in FTUI's cooperative agreement.

Second, FTUI's agreement permits it to reject nominated visitors, which could potentially embarrass USIA and American ambassadors. However, such rejections have been infrequent and have not had a significant negative effect on the labor IV program.

Third, available data indicate that FTUI had the highest average administrative cost per participant of the eight IV programming agencies during fiscal years 1991 and 1992, even though FTUI recently reduced its administrative budget.

Fourth, over the last several years, relations between FTUI and USIA officials have been strained because of alleged inappropriate conduct by FTUI officials. However, USIA has not formally notified FTUI of any specific incidents to which they could respond.

In response to FTUI's allegation that USIA employees attempted to reduce the number of labor-related IVs, OIG found evidence that two representatives from two of the E Bureau's geographic branches discouraged USIS officers from using FTUI as a programming agency because of their discontent with FTUI's programming efforts. However, it should be noted that since fiscal year 1990, the number of labor-related visitors programmed by FTUI increased by almost eight percent.

OIG recommended that USIA establish standards for IV programs and make such standards a condition for receiving future grants from USIA. OIG also recommended that program coordination and evaluation be improved, both in the field and in Washington. Finally, USIA - FTUI dialogue aimed at resolving questions of employee conduct should be a priority.

E Bureau concurred with OIG's recommendations; however, implementation plans have not yet been developed.

Criminality and Misconduct Investigations

J-Visa Fraud

An OIG investigation disclosed that an employee of an educational institution had been selling fraudulent J-Visa authorization forms for study in the United States to foreign students for approximately $1,000 each.

The Report of Investigation was forwarded to the Office of the U.S. Attorney.

Destruction of U.S. Government Property

An investigation disclosed that a Bureau of Broadcasting employee deliberately damaged a vehicle security gate while exiting a building. The matter was referred to the Office of the U.S. Attorney.

Thefts or Misuse of U.S. Government Funds

- An investigation disclosed that a USIA employee converted numerous money orders amounting to about $1,400 that were intended for the payment of vendors to her own personal use.

The Report of Investigation was forwarded to the Office of the U.S. Attorney.

- In a similar case, prior to being transferred to the Department of Housing and Urban Development, a USIA employee converted about $400 worth of money orders intended to pay vendors for her own personal use.

The Report of Investigation was forwarded to the USIA Office of Personnel for recoupment action.

***INSPECTOR GENERAL'S NOTE*:**

It should be noted that OIG reported in December 1989 (Report No. A-90-03) that USIA's use of money orders did not comply with imprest fund regulations and that greater oversight of cashier operations was needed.

In addition, a July 1992 OIG report (Report No. A-92-04) recommended that USIA take steps to accelerate its implementation of the government credit card program and reduce the use of cashier imprest funds, including the use of the funds for the purchase of money orders.

Money Order Fraud

The owner of a small firm that sold money orders to USIA elements for the payment of small purchases failed to deposit approximately $10,000 of USIA funds into the governing money order account. As a result, USIA made second payments to vendors.

The Report of Investigation has been forwarded to the Office of the U.S. Attorney.

Overseas Post Management

USIS Philippines

An OIG review of USIA activities in the Philippines found that USIS was making important contributions to the embassy's program objectives in that country. However, the inspection identified a number of areas where efficiency could be improved and/or economies effected.

- OIG recommended selected staff cuts of Philippine employees deemed excessive to post needs. This action, if implemented, would result in annual savings of nearly $75,000.

- The cultural section could benefit from restructuring and integration. Recommendations included giving up leased space on the fourth floor of the building

they currently occupy and relocating to the ground and second floors. If implemented, this move would save in excess of $50,000 yearly in lease expenses. Visits by a design consultant and a computer specialist to work out plans to reorganize the space and develop local area networks will be required.

- OIG agreed with the Public Affairs Officer that the donated book program, which was an administrative burden on the post, should be turned over to a private organization. This transfer would result in a savings of both USIS staff time and money.

- USIS was performing too many tasks for other U.S. government agencies, such as providing printing and photographic services, without fair reimbursement. The post has agreed to tighten procedures for approving these services, and for obtaining appropriate reimbursement when such services are provided.

- OIG also recommended surveys to reassess: (1) the efficacy of producing radio tapes in three languages for use throughout the archipelago; (2) program relevance and cost effectiveness of Distribution and Records System (DRS) distributed materials; (3) appropriate USIS support for the American studies program in the Philippines; and (4) all reproduction/printing activities undertaken by the post.

In addition, OIG found that the property inventory list was out of date and could not be reconciled with USIS headquarters property records. Further, a schedule for the replacement of post furniture, appliances and equipment needed to be established.

The Distribution and Records System was not an effective operational tool. It required updating and reorganization.

All 35 recommendations contained in the report were resolved; USIA has initiated action for compliance.

OIG Work In Progress

The following OIG work is currently in progress:

- Resolution of costs questioned in OIG audits of grants.
- Policies and procedures for domestic and international travel.
- Operation and maintenance of financial management system software.
- Grant administration and procurement actions at USIS Germany.
- Controls over the funding for the English Teaching Program.
- Internal Revenue Service requirement for reporting miscellaneous income.
- Inspections of USIS posts in Costa Rica, Nicaragua, Honduras, El Salvador, Guatemala, Panama and the VOA Belize radio relay station.
- Improper and illegal acts by employees, grantees, and contractors.

FOLLOW-UP ACTIONS

Criminality and Misconduct Investigations

Senior Official Prosecuted

Inspector General Finding:

"Bureau of Broadcasting - False statements were made by a senior official regarding time and attendance irregularities amounting to about $17,000." (Semiannual Report, September 30, 1992, page 22.)

Action:

The case was presented to and accepted by the Office of the U.S. Attorney for criminal prosecution. On March 18, 1993, the employee pleaded guilty. The employee, who subsequently retired, was sentenced to six months home detention, placed on probation for two years, fined $10,000, ordered to make restitution of $9,131 and was required to perform 187 hours of community service.

Questioned Cost Resolution

Inadequate Support for Allowing Questioned Costs

Inspector General Finding:

"The report [concerning The Center for Excellence in Education], issued on August 6, 1990, made recommendations about questioned costs of $33,396. On March 4, 1992, OIG received a final determination from the Contracting Officer on the questioned costs, which sustained $448. ... OIG found this resolution [determination] unacceptable and sent a memorandum dated June 1, 1992 to the Contracting Officer." (Semiannual Report, September 30, 1992, page 23.)

Action:

On March 31, 1993, USIA's Contracting Officer reaffirmed the determination to sustain $448 cf the $33,396 OIG had questioned. OIG continues to disagree that the $32,948 difference has been adequately supported and will be reporting on a broader review of Office of Contracts determinations on questioned costs in the next reporting period.

An analysis of final actions taken by the Office of Contracts regarding $4,172,442 in questioned costs noted in 48 OIG grant audit reports issued during fiscal years 1988 through 1992, shows that USIA collected $1,022,081, or about 24 percent of the amount questioned. This difference is due, in some cases, to other decisions by the Office of Contracts based on unsupported costs. For example, in one audit, OIG questioned $533,641 as unsupported, but the Office of Contracts allowed all the costs because a Defense Contract Audit Agency audit of the grantee, conducted seven years earlier, had not questioned similar costs.

It should be noted that, as of March 31, 1993, collections are still pending on eight USIA grant audit reports issued during the last five fiscal years. The Office of Contracts took over six months to issue a final determination on five of the eight audits. The three remaining audits were appealed by the grantees, but the designated USIA appeals official has not yet issued decisions even though two of the audit reports were issued over two years ago and the third over five years ago.

In the case of these eight grant audits, of the $1,294,062 questioned by OIG, USIA has only collected partial payments of $10,216 or less than one percent.

VOA Modernization Program

Slow Progress on Sri Lanka Relay Station

Inspector General Finding:

"The Agency's fiscal year 1991 Congressional budget submission requested $955,000 for engineering efforts to refurbish the Sri Lanka relay station....[However]...VOA intends to use the $955,000 not to refurbish the existing facility, but to construct a new shortwave station at Puttalam, 100 miles north of the existing station." (Emphasis added) (OIG Audit Report No. A-90-22 "Review of Selected VOA Modernization Issues" dated July 27, 1990)

Action:

In 1984, VOA selected a site at Chilaw and provided $500,000 to remove squatters. Despite the expenditure of these funds the squatters remained. This site

was then abandoned and a second site, at Puttalam, was selected. Subsequently, this site was also rejected after funding was cut and the scope of the project scaled back from a seven to a three transmitter station. VOA then decided to return to the original site, Chilaw, and use a portion of it to construct the new station. According to VOA, the squatters, now referred to as displaced colonists, have been removed from the Chilaw site.

According to VOA, $9 million was spent on the design of the seven-transmitter station that was canceled by the Office of Management and Budget because of financial constraints. An additional $44.4 million has been obligated for the scaled back, three-transmitter station.

However, with the exception of a security fence around the Chilaw site, actual construction on the new station has not begun.

This lack of progress and expenditure of funds continue to be of concern to OIG.

PROPERTY MANAGEMENT

System Improvements Still Being Implemented

Inspector General Finding:

"As of mid-December 1991, the [property management] system's database was incomplete, inaccurate, and of little use for management control. Therefore, PIAS [Property Inventory Accountability System] could still not accurately account for over $200 million of non-expendable personal property worldwide. This weakness was first identified in 1985." (Semiannual Report, March 31, 1992, pages 9 and 11.)

Action:

The Bureau of Management decided to implement a personal computer (PC)-based property management system for all overseas posts and to subsequently convert the current PIAS system to the same PC-based system. Based upon availability of funding, overseas implementation is scheduled by November 30, 1993 and conversion of PIAS to the new PC-based system is

expected no later than March 1, 1994. According to the Bureau, action has been completed on most of OIG's recommendations, and the overseas property database has been updated with all available information.

INSPECTOR GENERAL'S NOTE:

As disclosed during recent OIG reviews of USIA posts in the Philippines, Eastern Europe and five countries in Central America, property management problems persist, especially in the reconciliation of property inventories. (See pages 14 and 25 of this report.)

ACQUISITION MANAGEMENT

Process Needs To Be Strengthened

Inspector General Finding:

"A review of Agency procurement practices found that management of the acquisition process could be strengthened." (Semiannual Report, March 31, 1992, page 6)

Action:

The Office of Contracts is now using a new automated procurement system to strengthen the acquisition management process. The system is intended to ensure the timely award of contracts and bring significant deviations from milestone plans to the attention of Office of Contracts supervisory officials for evaluation and initiation of any necessary remedial action.

The Office of Contracts has also promised to tighten controls related to other deficiencies identified in the OIG report. For example, USIA incurred about $8.3 million, or 11 percent, cost growth on seven of 14 fixed-price contracts reviewed. In addition, two contracts valued at about $8.5 million were awarded without the benefit of adequate cost analyses or pre-award audits to assist in evaluating the contractors' proposals.

FINANCIAL MANAGEMENT

Excessive Year-End Spending Patterns

Inspector General Finding:

"The excessive year-end spending patterns identified in OIG audits of fiscal years 1987 and 1988 have continued in fiscal years 1990 and 1991. These patterns have greatly hampered the ability of contracting officers to properly review and process procurements and have subjected the process to wasteful spending."
(Semiannual Report, September 30, 1992, page 21.)

Action:

USIA instituted a senior-level Resource Management Committee during the final months of fiscal year 1992, which is responsible for ensuring that resource decisions prevent unneeded year-end spending.

J-VISA PROGRAM

Visitor Tracking Issue Still of Concern

Inspector General Finding:

"USIA controls over J-Visa authorization forms are inadequate. ...[In addition,] the computer system does not record whether exchange visitors remain in the U.S. after programs have finished..." (Semiannual Report, March 31, 1991, page 4 and Semiannual Report, September 30, 1991, page 3.)

Action:

Regulations governing the J-Visa program were issued on March 19, 1993. The regulations include requirements that are intended to provide for an accounting of J-Visa authorization forms.
(See related item on page 12.)

OIG is still concerned, however, that USIA is unable to determine whether visitors that it sponsors return to their home countries upon completion of their programs being of the opinion that the purpose of the J-Visa program is subverted if they do not do so. USIA's Office of General Counsel opines that admission into and departure from the United States of non-immigrant aliens is solely within the statutory jurisdiction of the Immigration and Naturalization Service.

SEVILLE EXPO '92

Construction Costs Remain Unpaid

Inspector General Finding:

"USIA entered into an agreement with the U.S. Navy for the design and construction management of the U.S. Pavilion. Despite a series of difficulties, the Pavilion opened as scheduled on April 20, 1992. Nevertheless, construction costs exceeded USIA authorized funding by $2.6 million [including exchange rate adjustments]."
(Semiannual Report, September 30, 1992, page 1.)

Action:

USIA paid the Navy $560,000 for exchange rate adjustments, but each disclaimed responsibility for the remaining $2.04 million. The latter resulted from a cost overrun on four unilateral change orders which originally totalled $217,000 that the Navy issued to the construction contractor in February and March 1992 to complete the Pavilion on time.

OIG found that both USIA and the Navy contributed to the increased costs. The General Accounting Office reached the same conclusion and, in a February 19, 1993 decision, stated that USIA, as the construction project's direct beneficiary, should fund the excess costs, subject to audit by the Defense Contract Audit Agency.

USIA is awaiting concurrence from the House Appropriations Committee before paying the claim, and may be liable for significant interest and other costs if the claim remains unsettled.

Cost of Bill of Rights Exhibit Remains Undetermined

Inspector General Finding:

"... USIA's Office of Contracts did not definitize (a letter contract with Staples and Charles, Ltd. for the design of the Bill of Rights exhibit) until... after all work was completed. ...[In addition,] because of apparent defective pricing, the firm fixed-price portion of the contract was overstated by $77,357."

"...the contractor (Maltbie Associates) has billed USIA for about $1 million (for the fabrication and installation of the Bill of Rights Exhibit). However, since a final negotiated settlement has not been made, the cost of the contract remains undetermined."
(Semiannual Report, September 30, 1992, page 2.)

Action:

On February 11, 1993, the Office of Contracts issued instructions to its staff to establish and follow definitization schedules for all letter contracts.

However, as of March 31, 1993, the Office of Contracts had not reached a final negotiated settlement on either of the two letter contracts.

NATIONAL ENDOWMENT FOR DEMOCRACY (NED)

About $3 Million in Grantee Costs Questioned

Inspector General Finding:

"About $3 million in NED grantee costs were questioned of which approximately $800,000 were unallowable and $2.2 million unsupported. For example, unallowable costs included $484,830 for net program salaries and administrative costs allocated to USIA-funded NED grants instead of to the Agency for International Development and other privately funded programs."
(Semiannual Report, September 30, 1992, page 3.)

Action:

To date, NED has sustained $1,743 out of $298,578 in questioned costs. The $296,835 difference relates to net program salaries and administrative costs overallocated to USIA. NED believes its method of allocations followed congressional intent. The Office of Contracts and OIG are reviewing this determination. However, it should be noted that starting in fiscal year 1993, NED grantees have properly established overhead rates that will allocate such costs among all agencies. (See related item on page 16.)

NED determinations on the remaining $2.7 million in questioned costs are scheduled to be made by July 19, 1993.

Inadequate Financial Oversight

Inspector General Finding:

"NED failed to provide the oversight necessary to assure that federal funds were spent and accounted for by its grantees in accordance with Office of Management and Budget circulars and grant agreements."
(Semiannual Report, September 30, 1992, page 3.)

Action:

NED indicated that it has taken a number of measures to strengthen its financial controls, the effectiveness of which will be assessed by OIG in future audits. USIA also indicated that it is taking steps to improve its oversight of NED. In addition, in response to an OIG finding that its record of soliciting private funds to support its programs was poor, NED is establishing guidelines for such solicitations.

DELPHI RESEARCH ASSOCIATES (DRA)

Federal Funds Improperly Used to Support Profit-Making Affiliates

Inspector General Finding:

"DRA received USIA grants totalling about $9 million during 1988 and 1989 and improperly used up to $290,000 in federal funds to make unauthorized loans to, and investments in, its profit-making affiliates. During this period, about 99 percent of DRA's funds came from federal sources.

In addition, DRA improperly used federal funds to pay the monthly operating expenses of its affiliates. As of December 31, 1989, the affiliates owed DRA $189,060 for unreimbursed operating expenses."
(Semiannual Report, September 30, 1992, page 4.)

Action:

These matters are being examined by OIG's investigative unit.

International Development Exchange (IDE)

Misuse of Grant Funds

Inspector General Finding:

"IDE expended over $27,000 for unallowable activities, including almost $20,000 for travel costs, salaries and consultant fees for fund raising activities. In addition, over $32,000 was expended for administrative costs without adequate supporting documentation."
(Semiannual Report, September 30, 1992, page 4.)

Action:

USIA's Office of Contracts is evaluating the questioned costs. In addition, certain aspects of these matters are currently being examined by OIG's investigative unit.

USIS Paris

Improper Grant Awards

Inspector General Finding:

"USIS Paris officers, in violation of USIA regulations, made grant awards totaling $56,161 to the Fulbright Commission although they knew the awards were to obtain funds for the payment of post representational expenses in excess of authorized ceilings."
(Semiannual Report, September 30, 1992, page 5.)

Action:

This practice, which appears to have been followed since at least 1985, was examined by OIG's investigative unit and was forwarded to the Office of the U.S. Attorney for review.

USIA's Bureau of Management issued a notice regarding the proper use of grants which it cabled to all overseas posts on November 19, 1992. In addition, USIS Paris sent a cable dated November 9, 1992, stating the Franco-American Commission for Educational Exchange (the Fulbright Commission) had implemented a system for tracking grant funds by individual award and had installed an automated accounting system. USIS Paris also indicated that the post has taken action to strengthen its grant award procedures.

OVERSEAS POST MANAGEMENT

Some Recommendations Addressing Eastern European Operations Remain Unimplemented

Inspector General Finding:

"A five-country review of USIA operations in Eastern Europe resulted in 125 recommendations." (Semiannual Report, March 31, 1992, pages 10-12)

Action:

As of March 31, 1993, 22 of these recommendations remain unimplemented. One of the 22 recommendations not implemented involves the installation of a fire alarm system at the American Library in Bucharest, a requirement that has existed since 1972. USIA plans to have this fire alarm system installed by April 15, 1993. Other recommendations that have yet to be implemented include those relating to property accountability and audience identification and tracking systems.

Lack of Property Accountability

Inspector General Finding:

"Due to a lack of internal controls and oversight of USIA property in Eastern European posts by both the posts and USIA Washington, neither USIA Washington nor post property records reflected accurate inventories. The disparity between USIA Washington and field records was as high as 50 percent and reconciliation was nearly impossible." (Semiannual Report, March 31, 1991, page 11.)

Action:

The Bureau of Management has advised OIG that an inventory list will be sent worldwide in April 1993 along with accompanying instructions directing all posts to conduct inventories and update their property records.

Ineffective Audience Identification and Tracking Systems

Inspector General Finding:

"No USIS post in the area had an audience identification and tracking system working effectively as a management and program tool.

USIS posts are compiling audience data and are waiting for the delivery of a new software system which has been in preparation for two and a half years (now three and a half) but is scheduled for delivery in the near future."
(Semiannual Report, March 31, 1992, page 12)

Action:

As of March 31, 1993, the computer software for the development and implementation of a new audience identification and tracking system (also known as the Distribution and Records System) has not been sent to the posts.

APPENDIX A

REPORTS ISSUED

Report No./ Issue Date	Title/Auditee	Questioned Costs Total	Questioned Costs Unsupported	Funds Put To Better Use
	INSPECTION REPORT			
I-93-01 3/31/93	Inspection of USIS Philippines	-0-	-0-	$ 125,000
	AUDIT REPORTS			
	Internal and Management Audits			
L-93-01 11/24/92	Significant Savings Can Be Realized on USIA International Airline Travel Costs	-0-	-0-	$ 270,000
L-93-02 3/05/93	USIA's Implementation and Compliance with OMB Circular No. A-125 "Prompt Payment"	-0-	-0-	-0-
L-93-03 1/07/93	USIA's Progress in Implementing the Federal Managers' Financial Integrity Act of 1982	-0-	-0-	-0-
L-93-08 2/26/93	USIA's Progress during FY 1992 in Controlling and Reporting on Contracted Advisory and Assistance Services	-0-	-0-	-0-
L-93-09 3/29/93	USIA's Compliance with Restrictions on Lobbying Provisions	-0-	-0-	-0-
L-93-10 3/02/93	USIA's Compliance with Section 160 of the 1992 Energy Policy Act	-0-	-0-	-0-
L-93-12 4/02/93	Office of Cuba Broadcasting Consolidation Project	-0-	-0-	$3,500,000*
L-93-15 3/31/93	Weaknesses in Controls over Cultural Allowance Expenditures	-0-	-0-	-0-
L-93-17 4/15/93	Review of the Labor International Visitor Program	-0-	-0-	-0-

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* $3.5 million of Funds Put to Better Use are the estimated cost savings that would result from OIG's recommendation for the Office of Cuba Broadcasting (OCB) to cancel plans to establish its own television broadcast studio. TV Marti currently shares WORLDNET's studios and has offices in the Patrick Henry Building. OIG recognizes that OCB will incur additional costs for needed improvements to their present facilities, but these costs have not yet been determined.

...Appendix A - Continued

Report No./ Issue Date	Title/Auditee	Questioned Costs Total	Questioned Costs Unsupported	Funds Put To Better Use
	Grant and Contract Audits			
A-93-02 3/23/93	Statement of Cash Receipts and Disbursements for the U.S. Pavilion Gift Shop, Seville Expo	-0-	-0-	-0-
A-93-03 3/02/93	Costs Claimed under USIA Contract AI-2309-C2244160 Staples & Charles, Ltd.	$18,225	-0-	-0-
L-93-11 3/11/93	Pre-Award Accounting System Survey of ECOLOGIA	-0-	-0-	-0-
	Indirect Cost/Provisional Rates Proposal Reviews			
L-93-04 1/08/93	National Democratic Institute for International Affairs	-0-	-0-	-0-
L-93-05 1/08/93	International Republican Institute	-0-	-0-	-0-
L-93-06 1/08/93	Free Trade Union Institute	-0-	-0-	-0-
L-93-07 1/08/93	Center of International Private Enterprise	-0-	-0-	-0-
L-93-13 3/30/93	Institute of International Education	-0-	-0-	-0-
L-93-14 3/26/93	Future Farmers of America Foundation, Inc.	-0-	-0-	-0-
L-93-16 3/31/93	American Council of Teachers of Russian	-0-	-0-	-0-
	TOTAL:	$18,225	-0-	$3,895,000

APPENDIX B

INVESTIGATION ACTIVITIES

Investigative Inventory

Pending - Beginning of period	38
Opened During Period	23
Closed During Period	7
Pending - End of Period	54

Hotline Calls

Number Received	2
Investigations Initiated	0
Referred to Agency Management	0
Closed - No Action Taken	2

Investigative Results

Disciplinary Actions Taken	1
Corrective Actions Taken	0
Recoveries/Restitutions	$19,531
Pending Department of Justice Prosecutorial Review	9
Pending USIA for Administrative/ Disciplinary Action	1

APPENDIX C

REPORTS ISSUED WITH QUESTIONED COSTS

		Number of Reports	Dollar Value of Questioned Costs (in thousands) Total Costs	Unsupported Costs*
I	**Reports subject to a decision by management:**			
	a. During prior reporting periods	16	$4,659	$3,075
	b. During current reporting period	1	18	0
	c. Total	17	$4,677	$3,075
II	**Reports for which decisions were made during this period:**			
	a. Dollar value of disallowed costs	3	$ 270	$ 144
	b. Dollar value of costs not disallowed	2	67	30
	c. Total	3**	$ 337	$ 174
III	**Reports for which no decisions were made by the end of the reporting period:**	14	$4,340	$2,901
IV	**Reports for which no decisions were made within six months of issuance:**	2	$ 608	$ 243

* Amounts are also included in Total Costs.

** Two reports contained both disallowed costs and costs not disallowed.

APPENDIX D

REPORTS ISSUED WITH RECOMMENDATIONS THAT FUNDS BE PUT TO BETTER USE

		Number of Reports	Dollar Value (in thousands)
I	**Reports subject to a decision by management:**		
	a. Issued during prior reporting periods	2	$ 448
	b. Issued during current reporting period	3	3,895
	c. Total	5	$4,343
II	**Reports for which decisions were made during this period:**		
	a. Recommendations with which management agreed	2	$ 395
	b. Recommendations with which management did not agree	0	0
	c. Total	2	$ 395
III	**Reports for which no decisions were made by the end of the reporting period:**	3	$3,948
IV	**Reports for which no management decision was made within six months of issuance:**	1 *	$ 371

* OIG report A-90-29 also had questioned costs and is included in Appendix C.

APPENDIX E

REPORTS FOR WHICH NO MANAGEMENT DECISION HAS BEEN MADE WITHIN SIX MONTHS OF ISSUANCE

American Council of Learned Societies

The report, issued on September 28, 1990, made recommendations about questioned costs and accounting system deficiencies. The Contracting Officer has resolved all the accounting system recommendations. However, the Contracting Officer has not made a decision on recommendations of $370,843 in funds put to better use. Questioned costs of $239,613 in legal fees are under final review by the Office of Contracts. A decision regarding this matter is scheduled to be made during the next reporting period.(Report No. A-90-29)

American Council of Teachers of Russian

The report, issued on September 3, 1991, made recommendations to disallow $368,288 in questioned costs and correct deficiencies in the grantee's accounting system. The accounting system recommendations were satisfactorily resolved. A decision on the questioned costs is in clearance. (Report No. A-91-13)

APPENDIX F

DEBTS OWED TO USIA

In accordance with the Senate Committee on Appropriations report on the Supplemental Appropriations and Rescission Bill of 1980, the following chart shows preliminary, unaudited figures provided by USIA on appropriation-funded debts that were owed, overdue or resolved during the six-month period that ended March 31, 1993.

	Balance	Overdue	Resolved During Period
September 30, 1992	**$433,420**	**$155,223**	**$240,548**
March 31, 1993	**$397,737 (1)**	**$173,160 (2)**	**$378,847 (3)**

(1) Includes new debts of $343,164 accrued during the six-month period.

(2) Accounts includes three bankruptcy cases.
- **a. $77,904**
- **b. $ 2,271**
- **c. $ 4,542**

(3) Includes cash refunds, compromises, waivers, and write-offs.

APPENDIX G

INDEX OF INSPECTOR GENERAL ACT REPORTING REQUIREMENTS CROSS-REFERENCED TO THIS SEMIANNUAL REPORT

The following information, as requested by OMB memorandum dated October 26, 1992, sets forth OIG's compliance with Section 5 of the Inspector General Act of 1978, as amended by P.L. 100-504, October 18, 1988:

Section	Activities	Location in Report
5 (a)(1)	Significant problems, abuses and deficiencies this period	"Digest" (Pages 1-3)
5 (a)(2)	Recommendations for corrective action regarding the above	"Operational Activities" (Pages 7-15)
5 (a)(3)	Significant recommendations in previous reports not completed	"Highlights of Follow-up Actions" (Pages 3-5)
5 (a)(4)	Matters referred to prosecutive authorities	Pages 12-13
5 (a)(5)	Reports made to Agency head under section 6(b)(2)	None
5 (a)(6)	Listing of audit reports with cost data	Appendix A (Pages 27-28)
5 (a)(7)	Summary of each significant report	"Operational Activities" (Pages 7-15)
5 (a)(8) (A),(B),(C) & (D)	Statistical tables regarding management decisions on questioned costs	Appendix C (Page 30)
5 (a)(9) (A),(B),(C) & (D)	Statistical tables regarding management decisions on recommendations that funds be put to better use	Appendix D (Page 31)
5 (a)(10)	Summary of audit reports for which no management decision has been made within six months of issuance	Appendix E (Page 32)
5 (a)(11)	Significant revised management decisions	None
5 (a)(12)	Significant management decision with which the Inspector General is in disagreement	"Questioned Costs" (Pages 16-17)

PRINCIPLES OF ETHICAL CONDUCT FOR GOVERNMENT OFFICERS AND EMPLOYEES

To insure that every citizen can have complete confidence in the integrity of the Federal Government, each Federal employee shall respect and adhere to the fundamental principles of ethical service as implemented in regulations promulgated under sections 201 and 301 of this order:

(a) Public service is a public trust, requiring employees to place loyalty to theConstitution, the laws, and ethical principles above private gain.

(b) Employees shall not hold financial interests that conflict with the conscientious performance of duty.

(c) Employees shall not engage in financial transactions using nonpublic Government information or allow the improper use of such information to further any private interest.

(d) An employee shall not, except pursuant to such reasonable exceptions as are provided by regulation, solicit or accept any gift of other item of monetary value from any person or entity seeking official action from, doing business with, or conducting activities regulated by the employee's agency, or whose interests may be substantially affected by the performance or nonperformance of the employee's duties.

(e) Employees shall put forth an honest effort in the performance of their duties.

(f) Employees shall make no unauthorized commitments or promises of any kind purporting to bind the Government.

(g) Employees shall not use public office for private gain.

(h) Employees shall act impartially and not give preferential treatment to any private organization or individual.

(i) Employees shall protect and conserve Federal property and shall not use it for other than authorized activities.

(j) Employees shall not engage in outside employment or activities, including seeking or negotiating for employment, that conflict with official Government duties and responsibilities.

(k) Employees shall disclose waste, fraud, abuse, and corruption to appropriate authorities.

(l) Employees shall satisfy in good faith their obligations as citizens, including all just financial obligations, especially those--such as Federal, State, or local taxes--that are imposed by law.

(m) Employees shall adhere to all laws and regulations that provide equal opportunity forall Americans regardless of race, color, religion, sex, national origin, age, or handicap.

(n) Employees shall endeavor to avoid any actions creating the appearance that they are violating the law or the ethical standards promulgated pursuant to this order.

Excerpt from Executive Order 12674 of April 12, 1989.

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Provide the following: Who, What, When,Where, Why and How.

END

12/15/94